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July 21, 2003

The Honorable Gary E. Walsh
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Mr. Walsh:

Enclosed for filing are the original and 15 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for August 2003 and preliminary September 2003 as well BellSouth's Data Disclosure Report for July 2003. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with August data, and previews the changes BellSouth is considering making for September data.

Consistent with BellSouth's commitment to keep the Commission and CLEC informed about validated data issues, BellSouth is also providing the enclosed Data Disclosure Report for July 2003 that describes those validated data issues that affect performance measurement calculations for which a fix has not yet been scheduled. Generally, these issues have minimal, if any, impact on the overall measurement results or the exact timeframe for making the necessary system corrections have not been determined.

There are two additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its February 2003 Data Notification filed on January 8, 2003, BellSouth provided notice of a coding change to ensure that all completed orders are reported in certain provisioning measures and to address CLEC requests that more records straddling multiple months be included in the performance

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STATISTICS DEPARTMENT

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data. This change, which was Item No. 4 on the February 2003 Data Notification, was not implemented correctly, and BellSouth will be making additional coding changes with June 2003 data to address this problem.

Second, in its April 2003 Data Notification filed on March 11, 2003, BellSouth provided notice of a coding change to capture correctly in the maintenance and repair measures sub-rate 64 kbps services associated with an ISDN PRI. This change, which was Item No. 20 on the April 2003 Data Notification, was not implemented correctly, and BellSouth will be making additional coding changes with June 2003 data to address this problem.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Turner", with a stylized flourish at the end.

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record

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PROPOSED AUGUST 2003 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the August 2003 data month. Results for the August 2003 data month will be posted as follows:

Preliminary results September 21, 2003
Final results September 30, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* O-7, O-8, O-9, and O-11

Description of Change: Currently, PMAP is reporting based on the first inbound timestamp for some LSRs received from TAG. The appropriate timestamp to use, as pointed out in response to GA Exception 181, is the last inbound timestamp. Based on February 2003 data, the average change in duration for those LSRs having multiple timestamps was 11 seconds. BellSouth proposes to change the PMAP code to use the last inbound timestamp. This proposed change was Item (2) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ 3452)

Impact of Change: For FOC data reported in February 2003 there would be no change to the reported results.

Provisioning Measurements

- (2) *Affected Measures:* P-9

Description of Change: For the retail analog "ADSL Provided to Retail", BellSouth currently includes the Troubles reported on the data or "virtual" portion of the circuit as well as the voice or "physical" portion of the circuit. However, troubles received on wholesale circuits only deal with the physical line troubles, since all virtual trouble issues should be tested and resolved by the CLEC. This causes a mismatch between the type of

data reported for retail vs. wholesale in the durations of the BellSouth retail and CLEC DSL troubles. BellSouth proposes excluding from the ADSL retail analog any trouble closed out to a virtual portion of the circuit. This change is related to Item (7) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3344)

Impact of Change: Based on February 2003 data, the Percent Provisioning Troubles within 30 will be reduced 0.33%.

(3) *Affected Measures:* P-4

Description of Change: Currently, retail orders and some CLEC orders are being included in this measure, even though the customer has caused an extended interval due to an end user caused missed appointment. Consistent with the SQM, BellSouth proposes excluding those orders where the end user has extended the completion interval. This proposed change was Item (4) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3457)

Impact of Change: In March 2003 for BellSouth Retail in Georgia, this measure reflected extended intervals for 1.15% of the orders. For CLECs, extended intervals were reported for .68% of the orders.

M & R Measurements

(4) *Affected Measures:* M&R-1, M&R-2, M&R-3, M&R-4 & M&R-5

Description of Change: For the retail analog "ADSL Provided to Retail", BellSouth currently includes the Troubles reported on the data or "virtual" portion of the circuit as well as the voice or "physical" portion of the circuit. However, troubles received on wholesale circuits only deal with the physical line troubles, since all virtual trouble issues should be tested and resolved by the CLEC. This causes a mismatch between the type of data reported for retail vs. wholesale in the durations of the BellSouth retail and CLEC DSL troubles. BellSouth proposes excluding from the ADSL retail analog any trouble closed out to a virtual portion of the circuit. This proposed change was Item (7) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3344)

Impact of Change: Based on February 2003 data, the Customer Trouble Report Rate is reduced from 2.74% to 2.4%. Maintenance Average Duration for ADSL provided to retail will increase by an average of .89 hours. Repeat Report Rate will be reduced by an average of .003% across all states for ADSL provided to retail.

- (5) *Affected Measures:* M&R-1, M&R-2, M&R-3, M&R-4, & M&R-5

Description of Change: Currently, some CLLI codes are not being recognized for wire center determination. BellSouth proposes incorporating a new table into the data model for wire center determination. This proposed change was Item (8) on the Preliminary August 2003 Data Notification filed on June 2, 2003. (RQ3417)

Impact of Change: Minimal. The Customer Trouble Report Rate will increase 0.19% region wide.

PRELIMINARY SEPTEMBER 2003 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the September 2003 data month. Results for the September 2003 data month will be posted as follows:

Preliminary results October 21, 2003
Final results October 31, 2003

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* OSS-1, OSS-2, and all Pre-Ordering & Ordering Measures

Description of Change: In anticipation of Encore Release 13.2 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data is being correctly captured and reported.

Impact of Change: None

- (2) *Affected Measures:* O-1, O-2, and O-11

Description of Change: BellSouth proposes to change the "TAG" label on the measure to read "TAG/LENS/XML" to match the systems that are currently reported as part of the current "TAG" reporting structure. (RQ3696)

Impact of Change: None.

Provisioning Measurements

(3) *Affected Measures:* P-9

Description of Change: Currently PMAP does not match ADSL troubles to ADSL orders, Line Share troubles to Line Share orders, nor does it match Line Splitting troubles to Line Splitting orders. Any trouble, regardless of whether it physically affects voice or data is being counted in these disaggregations. BellSouth proposes to change the PMAP code to correctly match the trouble ticket to the appropriate service order product. (RQ2413)

Impact of Change: Based on March 2003 data, the results will change as follows: ADSL provided to Retail will change from 16.32% to 9.94% regionally and CLEC Line Share will change from 10.66% to 3.86% regionally.

(4) *Affected Measures:* P- 3

Description of Change: Currently, certain denial and restoral orders are being classified inappropriately as missed appointments. Denial/restoral orders are bulk completed in the switch. However, the recorded completion date is the date that SOCS completes the bulk orders reflecting the denial and restoral of service. If the bulk completion occurs after the appointment day, these orders are being incorrectly counted as a BellSouth missed appointment even though there is no missed appointment code on the order. If the appointment was missed, the order would reflect a missed appointment code input by the RCMAG organization. BellSouth proposes counting only records with a valid missed appointment code in the numerator of this measure. (RQ3074)

Impact of Change: For May 2003 for both Retail and Wholesale, 198 of 3,337,331 records (0.0005%) were marked as missed appointments without a valid missed appointment code.

(5) *Affected Measures:* P-5 (All States Except Georgia)

Description of Change: Currently, the ending timestamp for Average Completion Notice Interval is the first timestamp indicating that a completion notice was sent. In some cases, this initial notice is misleading because the order may be updated before it goes to final completion status and a final notice is sent. The code will be modified to only report the notify timestamp when the order goes to final completion status. (RQ3914)

Impact of Change: In May 2003, for 294,837 records in Alabama, the average duration was 1.117 hours. With this change, the average duration would be 1.120 hours.

Special Access Measurements

(6) *Affected Measures:* SA-2 (Georgia Only)

Description of Change: Currently, in the numerator of the SA-2 (FOC Receipt Past Due) report, BellSouth is counting ASRs that have received a past due FOC during the month in addition to ASRs that have not received a FOC and are past due at the end of the month. The numerator of this measurement should only include ASRs that have not received a FOC and are past due at the end of the reporting month. This proposed change will correct this issue. (RQ3676)

Impact of Change: BellSouth continues to investigate the impact of the proposed change and will quantify this impact as soon as possible.

(7) *Affected Measures:* SA-9 (Georgia and Tennessee only)

Description of Change: The posted numerator and denominator for the Annualized Failure Rate part of this measure are incorrect. Currently, total troubles are reported as the numerator and the sum of lines in service for the same period is reported as the denominator. Consistent with Appendix G of the SQM, BellSouth proposes to change the reporting and calculation to use average troubles for the preceding months as the numerator and average lines in service for the same preceding months as the denominator. (RQ3747 & RQ3748)

Impact of Change: None.

(8) *Affected Measures:* SA-5, SA-6 and SA-7 (Georgia, Florida and Tennessee only)

Description of Change: Currently, PMAP is miscalculating the duration for these measures by improperly including weekends and holidays in the calculation if the completion date for the duration falls on a weekend or a holiday. BellSouth proposes correcting the calculation. (RQ3814)

Impact of Change: For May 2003, 224 of 38,947 records had an additional day in the durations. For SA-6, ASR Receipt Date to FOC Due Date, 6 out of 9,827 records were affected, for ASR Receipt Date to Order Completion Date, 34 out of 18,356 records were affected and for ASR Receipt Date to Requested Due Date, 41 out of 9,822 records were affected. For SA-7, Past Due Circuits, 143 out of 143 records were affected.

DATA DISCLOSURE REPORT - JULY, 2003

| MEASURE/IMPACT | ISSUE DESCRIPTION |
|--|---|
| <p>Percent Rejected Service Requests (O-7) Firm Order Confirmation and Reject Responses Completeness (O-11)</p> <p>In November there were 94 of 562,126 (0.001%) records that should have been excluded. December 183 of 569,981 (0.0003%), January 210 of 679,323 (0.0003%).</p> <p>Impact for COG products: Nov02 - 42 of 3358 (0.12%) records should have been excluded. Dec02 - 131 of 3543 (3.69%) .Jan03 - 144 of 3909 (3.68%) .</p> | <p>Canceled LSRS with no FOC or Reject response are being included in the O-7 and O-11 denominator. These records should be excluded from O-7 and O-11.</p> |
| <p>P1,2,2A,2B,3,4,4A,4B,5,6,9,10 - All states</p> <p>In March, the volume of retail DS1/DS3 Interoffice Services would decrease from 4818 to 4801, or 0.35%.</p> | <p>Conversions from Special Access to EELs are not being captured as a UNE, but as a Retail DS1/DS3 Interoffice Service. When the Special Access DS1 is converted to an EEL, the service maintains its existing Basic Class of Service (BCS) XDH1X (which was originally intended for Retail only).</p> |
| <p>Average Completion Notice Interval Impact will be determined pending current investigation.</p> | <p>With the implementation of the Ga order (March Data) PMAP is using the incorrect ending time stamp in the calculation of this measure.</p> |

STATE OF SOUTH CAROLINA

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CERTIFICATE OF SERVICE

COUNTY OF RICHLAND

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The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed August and Preliminary September Performance Data Change Notification Reports and July Data Disclosure Report in Docket No. 2001-209-C to be served upon the following this July 21, 2003:

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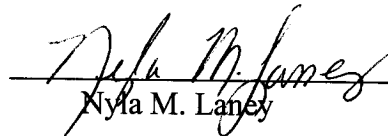
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